

**Remarks/Arguments**

Applicants have carefully reviewed Office action mailed 6 April 2009. To better distinguish their invention from the art of record, applicants have cancelled claims 1-18 previously pending in the application and have substituted claims 19-24. Applicants maintain that claim 19-24 patentably distinguish over the art of record for the reasons given below.

**35 U.S.C. 103(a) Rejection of Claims 1-18**

Claims 1-18 stand rejected under 35 U.S.C. § 103(a) as obvious over US. Patent No. 6,680,939 to Lydon et al. (hereinafter 'Lydon') in view of U.S. Patent No. 6,885,635 to Haq et al. (hereinafter 'Haq'). With claims 1-18 now cancelled and replaced by claims 19-24, applicants will address the rejection as if it were made against the newly submitted claims.

In applying the Lydon patent against now cancelled claim 1, the examiner asserts that Lydon discloses three router components (e.g., 50, 60, 70) having routing engines and links between routing engines. However, the Examiner has admitted that the Lydon patent does not disclose providing an additional routing engine for each router with links coupling the additional routing engines such that they are arranged in a fully connected topology. To cure the deficiencies of the Lydon patent, the Examiner has cited the Haq, as disclosing the use of two redundant routing engines. On this basis, the examiner contents it would be obvious to the skilled artisan to add the additional routing engines of Haq to the router of Lydon. Furthermore, the Examiner has concluded that it would also be obvious to connect the additional routing engines of Haq with additional links in a similar manner in which the Lydon routing engines are connected

Applicants take issue with the examiner's assertion that a skilled artisan would find it obvious to combine the Haq and Lydon patents to yield applicants' router recited in claim 19. Among the elements recited in applicants' newly recited claim 19 is

at least X routing components, where X is an integer greater than two, each of the X routing components having first and second routing engines, each routing engine having M inputs and N outputs where M and N are integers both greater than one, each routing engine routing a signal from one of the M inputs to one or more of the N outputs

As the examiner readily admits, the Lydon patent fails to teach the desirability of applicants' redundant routing engines, corresponding to the first and second routing engines recited in claim 19. While the Haq patent discloses multiple routing engines, the routing engines disclosed in the Haq patent do not have M inputs and N outputs nor do they route a signal from one of the M inputs to **one or more of the N outputs**. At best, each routing engine of Haq contains a table that representing learned routing protocols in a network specifying a next destination for incoming packets. Thus, the routing engines of Haq each route packets from one input (i.e., a previous node) to single output (i.e., a destination node). The Haq routing engines do not replicate an incoming packet to route the packet to multiple destinations, as would be required to match the functionality of applicants' redundant routing engines.

Simply stated, the routing engines of Haq route data packets from node to node in a network. The routing engines of Haq do not possess the capability of routing packets to multiple destinations. Thus, assuming arguendo the motivation to combine the Lydon and Haq patents as proposed by the examiner, the resultant combination would not provide a router with redundant routing engines, each capable of routing a signal from one of the M inputs to **one or more of N outputs**, as recited in applicants' amended claim 19. Therefore, claim 19 patentably distinguishes over the art of record.

Claims 20-24 depend from claim 19 and therefore incorporate by reference all of the features of claim 19, including the feature of redundant routing engines, each capable of routing a signal from one of the M inputs to **one or more of N outputs**. Therefore, claims 20-24 patentably distinguish over the art of record for the same reasons as claim 19.

**Conclusion**

In view of the foregoing, applicants solicit entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicant's attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

No fees are believed due with regard to this Amendment. Please charge and fee or credit any overpayment to Deposit Account No. **07-0832**.

Respectfully submitted,

By: /Robert B. Levy/  
Robert B. Levy, Attorney  
Reg. No. 28,234  
Phone (609) 734-6820

Patent Operations  
Thomson Licensing LLC  
P.O. Box 5312  
Princeton, New Jersey 08543-5312  
26 June 2009